

POLREP # 10
Chem-Fab Site
Doylestown, PA 18901

Event: CERCLA Response Activities

ATTN: Region III RRC

I. Situation (January 2016 – December 2016)

- A. On November 8, 2012, using authority provided under EPA Delegation 14-2, the On-Scene Coordinator (“OSC”) authorized the expenditure of funds in an amount not to exceed \$50,000 to initiate a removal action intended to reduce VOCs in suites inside an office building located 300-360 North Broad Street (“Property”), which Property is included within the Site. To accomplish this, the OSC installed portable air purifiers into selected suites within the impacted building. The OSC subsequently collected additional data to evaluate the efficacy of such units combined with the existing building vapor mitigation system in reducing VOCs levels within the building.
- B. In January 2012, the Remedial Program completed a Focused Feasibility Study intended to evaluate alternatives to address threats presented by soils located at the Property. In December 2012, the Remedial Program issued a Record of Decision (ROD) selecting remedial action consisting of, among other things, the removal and off-site disposal of certain contaminated soils on the Property outside the footprint of the three commercial buildings on the Property.
- C. Based on the data collected (see Section III of the Original Action Memo), potential future conditions at the Site, the extent of contamination and other reasons (e.g., lack of Remedial and State funding to do the work), the OSC determined that continued Removal Action was necessary to mitigate or prevent a threat to public health and that a change of scope, additional funding, and an exemption to the 12-month limit were required to perform such action.
- D. On September 19, 2013, EPA issued an Action Memorandum approving a scope change, the expenditure of additional funds, and an exemption to the statutory funding and time limits on the Removal Action. The selected Removal Action consisted primarily of the excavation and off-site disposal of certain contaminated soils presently located at the Property.
- E. On May 28, 2014, a Change of Scope was approved to additionally address the threat to public health from groundwater impacted by the contaminated soils on the Property. Hazardous substances in soils at the Property have been determined to be responsible for groundwater contamination that has impacted two private supply wells down gradient from the Property. Under this Change of Scope, bottled water will be provided to one private property where such impacts are significant. The need to connect such property to public water will be decided in the near future;

however, based on the results of the sampling, there is an immediate need to provide the occupants of this property with bottled water.

- F. On January 20, 2015, EPA issued an Action Memorandum approving a scope change on the Removal Action (“Action Memo III”). This change of scope was to install a permanent connection to the affected residence to the Doylestown Township Municipal Authority water supply.
- G. On September 30, 2015, EPA issued an Action Memorandum approving a scope change on the Removal Action (“Action Memo III”). This change of scope was to install a permanent depressurization system to reduce indoor TCE levels in Building A to 8 µg/m³ or below, which level has been determined in this situation to pose no unacceptable risk to the tenants and their patrons.
- H. For more information, see previous POLREPs.

II. Action Taken

- A. Week of January 4th: Indoor, sub-slab and ambient air samples were collected.
- B. On February 19th: Indoor air monitoring was conducted with a PPB Rae 3000 at the site.
- C. On February 29th: Indoor air monitoring was conducted with a Frog-4000 and PPB Rae 3000 at the site.
- D. During the week of March 14th a tenth fan (with one suction hole at space 324 and one at space 328) was installed after evaluating the results of the air samples.
- E. On August 11th the OSC stopped by the site to check the depressurization system and noticed that five of the gauges were reading zero. After contacting the installer and checking the system, it was discovered that 4 of the fans had no power. After talking to the property owner, it was discovered that one of the tenants had moved out and the electricity to that space had been disconnected; therefore, the fans had stopped working.
- F. On October 12th the property owner had his electrician rewired the fans.
- G. To eliminate the possibility of the fans losing power due to tenants moving out and the electricity disconnected, during the week of 12/11 an electric “house panel” was installed by EPA’s subcontractor and all the fans were rewired to that “house panel.”

III. Future Actions

- A. Conduct additional indoor air and sub-slab air sampling to confirm effective operation of vapor extraction system

B. Adjust, if necessary, the depressurization system, based on the air samples results.

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